

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

IBNOMER M. SHARAFELDIN P.O. Box 555 Hagerstown, Maryland 21741 WASHINGTON COUNTY, MD	:	
	:	
Plaintiff	:	CIVIL ACTION NO. _____
vs.	:	
TERESA MYERS, 3684 Harold Place Greencastle, Pennsylvania 17225 FRANKLIN COUNTY, PA	:	FILED: _____
	:	
Defendant	:	

\* \* \* \*

**COMPLAINT**

Plaintiff, IBNOMER M. SHARAFELDIN, by and through his attorneys, Ramon Rozas III, Esq., and Friend & Rozas, LLC, files this Complaint, and sue the Defendant, TERESA MYERS, stating as follows:

**Parties**

1. Plaintiff IBNOMER M. SHARAFELDIN is a resident of Washington County, Maryland.
2. Defendant TERESA MYERS was, on November 22, 2005, a resident of the State of Pennsylvania.
3. That all of the events described hereinafter occurred in the State of Maryland.

**Venue and Jurisdiction**

4. That venue is proper in this Court, pursuant to 28 U.S.C., sec. 1391.
5. That this Court has jurisdiction over the parties, pursuant to 28 U.S.C., sec. 1332, as there is complete diversity between the Defendant and the Plaintiff and the amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000).

**Allegations Common to All Counts**

6. That on November 22, 2005, at approximately 9:36 a.m., Plaintiff Ibnomer M. Sharafeldin was lawfully operating his motor vehicle eastbound on Route 40 in Washington County, Maryland. Plaintiff Sharafeldin came upon a traffic-control signal at an intersection which turned to red, so he properly slowed his vehicle, and properly and lawfully came to a stop.

7. That at that same time and place, Defendant Teresa Myers was operating a motor vehicle eastbound on Route 40, directly behind the Plaintiff.

8. That Defendant Myers came upon the Plaintiff and failed to stop.

9. Defendant Myers struck Plaintiff Sharafeldin's vehicle in the rear.

10. Plaintiff Sharafeldin was injured in the collision, and required considerable medical treatment.

**COUNT I  
NEGLIGENCE**

11. That the Plaintiff incorporates herein the allegations of paragraph 1 through 10 of the Complaint.

12. Defendant Myers operated her vehicle in a negligent, careless and unlawful manner by failing to maintain control of her vehicle, failing to maintain a lookout, failing to travel at a safe speed, failing to observe Sharafeldin's vehicle, failing to stop to avoid a collision and by colliding with the Plaintiff's vehicle.

12. Defendant Myers had a duty of care to operate her vehicle in a safe and lawful fashion, had a duty of care to maintain control of her vehicle, had a duty of care to operate his vehicle at a safe speed, and had a duty of care to maintain a proper lookout.

13. Defendant Myers breached these duties of care.

14. Defendant Myers' negligence proximately caused Plaintiff to suffer serious injuries, and to suffer great mental anguish, incur expenses, suffer loss of work, wages and property damage. All such injuries were caused solely by the negligence of the Defendant, without any negligence by Plaintiff contributing thereto.

**WHEREFORE**, Plaintiff, IBNOMER M. SHARAFELDIN, demands judgment against Defendant TERESA MYERS, in the amount of Two Hundred and Fifty Thousand Dollars (\$250,000.00) in compensatory damages, plus pre-judgment and post-judgment interest and costs.

\_\_\_\_\_/S/\_\_\_\_\_  
Ramon Rozas III, Esq.  
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**REQUEST FOR TRIAL BY JURY**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, the Plaintiffs request a trial by jury.

\_\_\_\_\_/S/\_\_\_\_\_  
Ramon Rozas III, Esq.